

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<sup>1</sup> Plaintiff intends to amend her instant lawsuit to include claims under the PHRA once her administrative remedies are fully exhausted with the Pennsylvania Human Relations Commission (“PHRC”).

3. This Court may properly maintain personal jurisdiction over Defendant because its contacts with this state and this judicial district are sufficient for the exercise of jurisdiction over Defendant to comply with traditional notions of fair play and substantial justice, satisfying the standard set forth by the United States Supreme Court in *Int'l Shoe Co. v. Washington*, 326 U.S. 310 (1945), and its progeny.

4. Pursuant to 28 U.S.C. § 1391(b)(1) and (b)(2), venue is properly laid in this district because Defendant is deemed to reside where it is subjected to personal jurisdiction, rendering Defendant a resident of the Eastern District of Pennsylvania.

5. Plaintiff filed a Charge of discrimination and retaliation with the Equal Employment Opportunity Commission (“EEOC”) and also dual-filed said charge with the Pennsylvania Human Relations Commission (“PHRC”). Plaintiff has properly exhausted her administrative proceedings before initiating this action by timely filing and dual-filing her Charge with the EEOC and PHRC, and by filing the instant lawsuit within 90 days of receiving a right-to-sue letter from the EEOC.

### **PARTIES**

6. The foregoing paragraphs are incorporated herein their entirety as if set forth in full.

7. Plaintiff is an adult who resides at the above-captioned address.

8. Ann’s Choice, Inc. d/b/a Ann’s Choice, a Pennsylvania corporation, is a senior living facility located at the above-captioned address.

9. At all times relevant herein, Defendant acted through its agents, servants and employees, each of whom acted at all times relevant herein in the course and scope of their employment with and for Defendant.

### **FACTUAL BACKGROUND**

10. The foregoing paragraphs are incorporated herein their entirety as if set forth in full.

11. Plaintiff was employed by Defendant for approximately 1.5 years, from in or about June 24, 2023, until her unlawful termination (discussed further *infra*) on or about October 11, 2024.

12. Plaintiff was hired by Defendant for the position of Complementary and Alternative Medicine (“CAM”) nurse.

13. At the time of Plaintiff’s hire, Defendant was aware that Plaintiff still needed her CAM certificate, as she worked with Defendant to obtain the necessary qualifications by attending classes.

14. Plaintiff was primarily supervised by Assisted Living Manager, Pamela Warner (Caucasian, hereinafter “Warner”). Additionally, at all times relevant herein, Defendant’s Human Resources (“HR”) Manager was Irene Ofori (Black/African – from Ghana, hereinafter “Ofori”).

15. Throughout her employment with Defendant, Plaintiff was a hard-working employee who performed her job well.

16. Plaintiff is a Black (African American) female, and during her employment with Defendant, she was subjected to disparate and discriminatory treatment because of her race and/or national origin.

17. The majority of the employees at Defendant’s Warminster, Pennsylvania facility were of Haitian and/or African descent (from Ghana and/or other African countries) while African American employees comprised only about 20-30%, and Caucasian employees about 10-15%.

18. Upon Plaintiff’s observations and belief, Haitian and/or African employees were treated more favorably than non-Haitian, African American, or Caucasian/American employees, who were subjected to disparate, discriminatory, and hostile treatment by management and HR. For example, but not intended to be an exhaustive sample:

- a. Warner, Ofori, and other members of management treated Plaintiff and other non-Haitian and/or non-African employees in a rude and condescending way, regularly talking down to them;
- b. A Haitian employee, Care Associate, Carleigh (last name unknown, hereinafter “Carleigh”) mocked Plaintiff about her dietary choices, including by stating “yeah, yeah, yeah, we know you don’t eat meat”; however, Carleigh did not make any picky or harassing comments like this to Haitian and/or African employees for their personal meal choices and/or cultural preferences;
- c. There was a clear pattern of selective enforcement of policies toward non-Haitian and/or non-African employees, including Plaintiff (*i.e.*, if a African-American individual made a single mistake passing medication or failing to do the same, they were immediately terminated, while Haitian and African employees, including but not limited to one employee named Rose (Haitian and/or non-African American, hereinafter “Rose”) were given multiple chances or allowable mistakes (4 in the case of Rose) before being terminated); and
- d. Non-Haitian and/or non-African employees were regularly provided with unfair discipline or pretextual admonishment, while Haitian employees were not disciplined for the same or similar issues (*i.e.*, in multiple cases of he said/she said incidents with staff, Haitian and/or African employees were almost always retained, while African American employees were regularly terminated without further discussion). In fact, at least one employee had stated to Plaintiff, “whenever a African American and Haitian and/or African employees go into the office for any issues, the African American person always gets fired.”

19. Additionally, on or about September 28, 2024 (less than two weeks prior to Plaintiff's termination), Plaintiff filed a complaint with Warner and Ofori about the hostility she was experiencing by Defendant's Care Associates, Mary Nicolas (African – hereinafter “Nicolas”) and Carleigh.

20. Specifically, Nicolas had hostilely screamed at Plaintiff within inches of her face without provocation for nonsensical reasons, which upon information and belief, is in direct violation of Defendant's workplace conduct policies.

21. However, in response to Plaintiff's complaint, on or about October 3, 2024, Ofori informed Plaintiff that *she* was being placed on a formal suspension pending an investigation into Nicolas' actions and hostility.

22. Thereafter, to Plaintiff's surprise, on or about October 11, 2024, Ofori informed Plaintiff that the investigation was closed and that she was being terminated, while Nicolas (African) retained her job, despite being the aggressor.

23. Plaintiff was never interviewed or questioned, despite an alleged investigation having occurred, which was particularly confusing and concerning to Plaintiff as she did not instigate or provoke the alleged incident.

24. It was well known within Defendant that a group of Haitian and/or African employees, including Nicolas, were responsible for routinely filing manufactured complaints against other non-Haitian and/or non-African employees in an effort to get them terminated – and Ofori (African) routinely sided with Haitian and/or other African employees for no legitimate reason.

25. For example, upon information and belief, Wilson (last name unknown, hereinafter “Wilson”) a Black (African American) employee with over a decade of employment and no prior

history of misconduct or disciplinary actions, was terminated shortly after a complaint was filed against him by Haitian and/or African employees.

26. Wilson's aforesaid termination occurred despite the absence of a proper and thorough formal investigation, with the African employee's (Nicolas') account of the interaction being accepted as fact, even though the employees involved did not work together.

27. Plaintiff was terminated without cause, despite that Nicolas was the aggressor and that Ofori herself admitted in a letter to Plaintiff dated October 10, 2024, "[w]e could confirm that Mary [Nicolas] engaged in a non-values based behavior when she inserted herself into the conversation and was in your face during the interaction." Nonetheless, while Plaintiff was terminated, Nicolas retained her employment with Defendant.

28. Despite having no prior disciplinary record, Plaintiff was singled out, whereas Nicolas faced minimal to no consequences for her actions, because Defendant, in particular Ofori, favored Haitian and/or African employees, desiring to retain them over non-Haitian and/or non-African employees.

29. Plaintiff believes and therefore avers that she was subjected to a hostile work environment and terminated because of her race, ancestry, ethnicity and/or national origin (in particular for being non-Haitian and/or non-African).

### **COUNT I**

#### **Violations of Title VII of the Civil Rights Act of 1964 ("Title VII")**

#### **([1] Race/National Origin Discrimination; and [2] Hostile Work Environment)**

30. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

31. During Plaintiff's employment with Defendant, she was subjected to discrimination through verbal reprimands, and derogatory and disparate treatment because of her race and national origin.

32. Plaintiff was then abruptly terminated on or about October 11, 2024, for completely pretextual reasons.

33. Plaintiff believes and therefore avers that she was really subjected to a hostile work environment because of her race and/or national origin, and for being non-Haitian and/or non-African.

34. Plaintiff also believes and therefore avers that her race and/or national origin were motivating and/or determinative factors in Defendant's termination of her employment.

35. These actions as aforesaid constitute unlawful discrimination and a hostile work environment under Title VII.

**COUNT II**  
**Violations of 42 U.S.C. Section 1981**  
**([1] Race, Ancestry and Ethnic Discrimination; and [2] Hostile Work Environment)**

36. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

37. During Plaintiff's employment with Defendant, she was subjected to discrimination through verbal reprimands, and derogatory and disparate treatment because of her race, ethnic and ancestral characteristics, and for being non-Haitian and/or non-African.

38. Plaintiff was abruptly terminated on or about October 11, 2024, for completely pretextual reasons.

39. Plaintiff believes and therefore avers that she was really subjected to a hostile work environment because of her race, ancestry, and ethnicity, and for being non-Haitian and/or non-African.

40. Plaintiff also believes and therefore avers that but for her race, ancestry, and ethnicity (and for being non-Haitian and/or non-African) she would not have been terminated from her employment with Defendant.

41. These actions as aforesaid constitute unlawful discrimination and a hostile work environment under Section 1981.

**COUNT III**  
**Violation of the Pennsylvania Wage Payment Collection Law (“WPCL”)**  
**(43 P.S. §§ 260.3(a)-(b))**  
**(Failure to Pay All Wages)**

42. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

43. Plaintiff had an agreement with Defendant whereby Defendant agreed to compensate Plaintiff for services she performed during her employment.

44. Defendant had a policy of and, in fact, Defendant’s HR, Ofori, informed Plaintiff that she would be paid double her hourly rate for all holidays worked.

45. Plaintiff’s hourly rate was \$22.78, and she worked approximately 3-4 holidays for Defendant during her employment that, upon information and belief, she was not paid double her hourly rate for.

46. Defendant failed to compensate Plaintiff for all wages owed during her employment with Defendant.

47. Plaintiff performed the agreed-upon services for Defendant, and Defendant failed to properly compensate Plaintiff for the services rendered as specified by the Parties’ employment agreement (included but not limited to paying Plaintiff double her hourly rate for all holidays worked).

48. These actions as aforesaid constitute violations of the Pennsylvania Wage Payment and Collection Law.

**WHEREFORE**, Plaintiff prays that this Court enter an Order providing that:

A. Defendant is to promulgate and adhere to a policy prohibiting discrimination and retaliation in the future against any employee(s);



B. Defendant is to compensate Plaintiff, reimburse Plaintiff, and make Plaintiff whole for any and all pay and benefits Plaintiff would have received had it not been for Defendant's illegal actions, including but not limited to back pay, front pay, salary, pay increases, bonuses, insurance, benefits, training, promotions, reinstatement and seniority;

C. Plaintiff is to be awarded punitive damages, as permitted by applicable law, in an amount believed by the Court or trier of fact to be appropriate to punish Defendant for its willful, deliberate, malicious and outrageous conduct and to deter Defendant or other employers from engaging in such misconduct in the future;

D. Plaintiff is to be accorded other equitable and legal relief as the Court deems just, proper and appropriate (including but not limited to damages for emotional distress, pain, suffering and humiliation);

E. Plaintiff is to be awarded the costs and expenses of this action and reasonable attorney's fees as provided by applicable federal and state law;

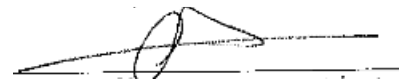
F. Plaintiff is to be awarded any and all statutory enhancements available as a matter of law; and

G. Plaintiff demands trial by jury on all issues so triable consistent with Fed. R. Civ. P. 38(a)(1).

Respectfully submitted,

**KARPF, KARPF & CERUTTI, P.C.**

By:



Ari R. Karpf, Esq.  
8 Interplex Drive, Suite 210  
Feasterville-Trevoze, PA 19053  
(215) 639-0801

Dated: May 2, 2025

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

Tanya Gilbert

v.

Ann's Choice, Inc. d/b/a Ann's Choice

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:  
:

CIVIL ACTION

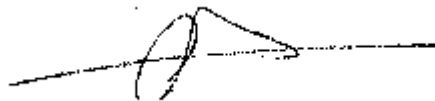
NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ( )
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (x )

5/2/2025



Plaintiff

Date

Attorney-at-law

Attorney for

215-639-0801

215-639-4970

akarpf@karpf-law.com

Telephone

FAX Number

E-Mail Address

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**DESIGNATION FORM**

Place of Accident, Incident, or Transaction: Defendants place of business

**RELATED CASE IF ANY:** Case Number: \_\_\_\_\_ Judge: \_\_\_\_\_

- |   |                              |
|---|------------------------------|
| 1. Does this case involve property included in an earlier numbered suit?  | Yes <input type="checkbox"/> |
| 2. Does this case involve a transaction or occurrence which was the subject of an earlier numbered suit?                              | Yes <input type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent which was the subject of an earlier numbered suit?                 | Yes <input type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus petition, social security appeal, or pro se case filed by the same individual?   | Yes <input type="checkbox"/> |
| 5. Is this case related to an earlier numbered suit even though none of the above categories apply?<br>If yes, attach an explanation. | Yes <input type="checkbox"/> |

I certify that, to the best of my knowledge and belief, the within case ☐ is / ☒ is not related to any pending or previously terminated action in this court.

**Civil Litigation Categories**

**A. Federal Question Cases:**

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts)
- ☐ 2. FELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☐ 5. Wage and Hour Class Action/Collective Action
- ☐ 6. Patent
- ☐ 7. Copyright/Trademark
- ☐ 8. Employment
- ☐ 9. Labor-Management Relations
- ☒ 10. Civil Rights
- ☐ 11. Habeas Corpus
- ☐ 12. Securities Cases
- ☐ 13. Social Security Review Cases
- ☐ 14. Qui Tam Cases
- ☐ 15. Cases Seeking Systemic Relief **\*see certification below\***
- ☐ 16. All Other Federal Question Cases. (Please specify): \_\_\_\_\_

**B. Diversity Jurisdiction Cases:**

- ☐ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☐ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☐ 5. Motor Vehicle Personal Injury
- ☐ 6. Other Personal Injury (Please specify): \_\_\_\_\_
- ☐ 7. Products Liability
- ☐ 8. All Other Diversity Cases: (Please specify) \_\_\_\_\_

I certify that, to the best of my knowledge and belief, that the remedy sought in this case ☐ does / ☒ does not have implications beyond the parties before the court and ☐ does / ☒ does not seek to bar or mandate statewide or nationwide enforcement of a state or federal law including a rule, regulation, policy, or order of the executive branch or a state or federal agency, whether by declaratory judgment and/or any form of injunctive relief.

**ARBITRATION CERTIFICATION (CHECK ONLY ONE BOX BELOW)**

I certify that, to the best of my knowledge and belief:

☒ Pursuant to Local Civil Rule 53.2(3), this case is not eligible for arbitration either because (1) it seeks relief other than money damages; (2) the money damages sought are in excess of \$150,000 exclusive of interest and costs; (3) it is a social security case, includes a prisoner as a party, or alleges a violation of a right secured by the U.S. Constitution, or (4) jurisdiction is based in whole or in part on 28 U.S.C. § 1343.

☐ None of the restrictions in Local Civil Rule 53.2 apply and this case is eligible for arbitration.

NOTE: A trial de novo will be by jury only if there has been compliance with F.R.C.P. 38.

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

GILBERT, TANYA

(b) County of Residence of First Listed Plaintiff Philadelphia  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Ari R. Karpf, Esq.; Karpf, Karpf & Cerutti, P.C., 8 Interplex Drive, Suite 210,  
Feasterville-Trevoze, PA 19053; 215-639-0801; akarpf@karpf-law.com

## DEFENDANTS

ANN'S CHOICE, INC. D/B/A ANN'S CHOICE

County of Residence of First Listed Defendant Bucks  
(IN U.S. PLAINTIFF CASES ONLY)NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question  
(U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity  
(Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice <b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>INTELLECTUAL PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education <b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
Section 1981 (42USC1981); Title VII (42USC2000)

Brief description of cause:

Violations of Section 1981, Title VII and the PHRA.

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE 5/2/2025

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE